

EXHIBIT 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 17-cv-00939-WHA
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
Defendants.)
-----)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF ANGELA L. PADILLA, ESQ.

San Francisco, California

Monday, October, 2017

Volume I

Reported by:

MARY J. GOFF

CSR No. 13427

JOB No. 2716665

PAGES 1-111

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OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
Defendants.)
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Highly Confidential Videotaped Deposition of
ANGELA L. PADILLA, ESQ. Volume I, taken on behalf of
Plaintiff Waymo LLC, at Quinn Emanuel Urquhart &
Sullivan, LLP, 50 California Street, 22nd Floor,
beginning at 9:11 a.m. and ending at 1:34 p.m., on
October 2, 2017, before MARY GOFF, Certified
Shorthand Reporter No. 13427.

1 subject? 10:34:28

2 A Truly, I do not. 10:34:29

3 Q So you can't testify as to what sources 10:34:45

4 within Uber were searched or not searched in -- to 10:34:47

5 comply with the court's order; is that right? 10:34:55

6 A I don't know if that impinges on privilege 10:35:03

7 or not. 10:35:05

8 Q Okay. What sources did Uber search within 10:35:05

9 Uber to comply with the court's order? 10:35:11

10 A As far as I recall, everywhere. Meaning 10:35:16

11 we took this order very, very seriously and put a 10:35:21

12 ton of people power on the direction here in 10:35:28

13 paragraph 4. 10:35:34

14 And I believe we also retained outside 10:35:36

15 experts to help us and moved heaven and earth to 10:35:38

16 look under every rock and understand the answer to 10:35:46

17 paragraph 4. 10:35:50

18 Q Okay. So who did -- who did you retain? 10:35:53

19 A I don't recall the name of the forensic 10:35:59

20 expert that was retained. 10:36:01

21 Q Do you recall the -- the entity? 10:36:02

22 A Hum-um. I don't. I'm sorry. 10:36:04

23 Q Do you know what specifically that entity 10:36:06

24 did to search within Uber? 10:36:10

25 A I'm sure -- sorry. Is your question done? 10:36:16

1 Do you have any nonprivileged information 01:30:11
2 regarding whether Uber has misappropriated Waymo's 01:30:13
3 trade secrets? 01:30:17
4 A I think everything I know comes from 01:30:29
5 the -- my representation of the company, so I think 01:30:31
6 it's privileged. 01:30:35
7 Q Do you have any nonprivileged information 01:30:53
8 regarding whether Uber has acquired any of Waymo's 01:30:57
9 trade secrets? 01:31:03
10 A Again, I think everything I know in that 01:31:09
11 regard comes through representing the company in 01:31:11
12 this case, so I think it's all privileged. 01:31:16
13 Q And do you have any nonprivileged 01:31:19
14 information regarding whether Uber is using any of 01:31:21
15 Waymo's trade secrets? 01:31:27
16 A No. 01:31:31
17 MR. PERLSON: And that -- I don't have any 01:31:34
18 further questions. I'll just note for the record 01:31:40
19 that I think that there are a lot of overbroad 01:31:43
20 privilege assertions, but we can fight about that 01:31:47
21 later, if necessary. And obviously, more 01:31:49
22 information is coming in, so I reserve the right to 01:31:51
23 call back if we find something new. 01:31:55
24 MR. GONZALEZ: Understood. Mr. Perlson, I 01:31:56
25 have about two minutes of questioning that I would 01:31:57

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